

MODERN SLAVERY STATEMENT 2025

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Introduction

As a company Blue Sky Botanics Ltd takes its responsibilities to avoid the exploitation of people for personal or commercial gains seriously. As a small business operating in the UK, we fall under the legal financial threshold and are therefore not required by law to publish a statement, but the company has decided to voluntarily publish one. We are fully committed to playing our part in eradicating modern slavery. We firmly advocate transparency and collaboration to eliminate the risks of modern slavery.

Due to the diverse nature of botanical raw materials and their methods of collection and harvesting throughout the world we recognise that there is a potential for exploitation within the supply chains.

Our modern slavery statement will be updated annually.

Our Business and Supply Chains

Modern slavery is the term used to encapsulate the offences of slavery, servitude, forced or compulsory labour and human trafficking – regardless of whether the victim knew they were being trafficked or not.

Blue Sky Botanics Ltd is a rural based Botanical Extracts manufacturer. We operate solely in the UK, where we have a production unit manufacturing extracts for the food/beverage, cosmetic and animal feed sectors. We employ approximately 40 people from the local area with a handful based remotely around the UK.

The majority of our botanical raw materials are sourced from all over the world, although some botanicals are grown on site at Castle Farm. A proportion of these raw materials are seasonal. The supply chains can be complex from farms / wild harvested / co-operatives through to traders and onwards to the UK.

We distribute our products globally.

Figure 1: Destination countries of our botanical extracts.

Austria	France	Italy	Switzerland
Australia	Germany	Netherlands	Thailand
Belgium	Hong Kong	Poland	UK
Brazil	Indonesia	Singapore	USA
Canada	Iran	Slovenia	
China	Ireland	Spain	

We deliver value to customers by turning bulky botanical materials into liquid extracts which are used to flavour, add active ingredients or value to beverages, food items and cosmetic products. We operate to a quality management system (BRC version 9) to produce high quality, consistent and consumer safe botanical extracts, while remaining ethical and offering a bespoke customer service.

We have a close relationship with many of the traders who supply the raw materials and even closer relationship to the suppliers of fresh wild harvested ingredients – particularly our English Elderflower source – which is our largest production volume product.

Figure 2: Priority Products and Ingredients and their main origin source countries.

Botanical	Main Origin Source
Elderflower	United Kingdom, Hungary
Ginger	India
Green Tea	Korea
Baobab	Zimbabwe

Due Diligence Processes

Consultation with our company solicitor, government bodies and agencies such as the UK Gangmasters & Labour Abuse Authority (GLAA), our leading customers and our Union of Ethical Biotrade (UEBT) membership supports our due diligence process.

Risk of modern slavery are dynamic and change quickly. We regularly reassess and assess any new supply chains during our supplier approval process which is in line with the British Retail Consortium (BRC) standards. We have a Strategic Sourcing Manager who works alongside our commercial and technical quality teams to establish risk in supply chains. Using UEBT risk assessment tools, collaboration with our botanical traders, who have the benefit of economies of scale which consequently leads to better supplier engagement, we are able to get greater visibility of the supply chain that we would have as a small business.

During the last year we have risk assessed our strategic and large volume raw materials to establish the highest risk supply chains and where possible have aimed to replace with lower risk sources.

We have highlighted that increased due diligence around modern slavery OR human rights, is needed when a supplier bring in large numbers of employees from other countries, especially those who are lower skilled and providing physical labour into our supply chains. Tools such as SAI platform help us to address if seasonal migrant workers are used for our strategic raw materials.

Strategic customers and suppliers often buddy-up and share their audit reports from throughout the supply chain. We can then use these to decide what action to take and in order to influence our supply chain partners to improve working practices or seek new sources.

Supporting Memberships

Sedex is the world's largest collaborative platform where companies can share responsible sourcing data and progress. We are members of Sedex and benefit from guidance, tools and shared expertise from many major retailers and manufacturers who have developed an ethical trade strategy, with focus on labour providers.

<https://www.sedex.com/>



SMETA 4-pillar has recently been added to our memberships. Obtained in March 2023 via an onsite audit.

Union of Ethical BioTrade (UEBT) support the respect for Human Rights as part of the raw material supply assessment.

<http://ethicalbiotrade.org>

Universal Declaration of Human Rights: is a critical requirement of the founding principles. As a business we are audited against these standards, both for our operation and our strategic raw materials.

<http://www.un.org/en/>

B-Corp certification was achieved in September 2024, affirming our commitment to social and environmental performance.



Tackling Modern Slavery – our business

In our own operations all of our colleagues are employed on permanent contracts, observing UK employment law, including the current minimum wage level. Recruitment is made by advertising both internally and externally in with UK. Any temporary workers we may recruit in future, i.e. during peak demand, will be recruited from within the UK, receive a reasonable number of paid hours each week and have the opportunity to transfer to permanent employment when vacancies arise.

The greatest risks of modern slavery exist for workers not in permanent employment.

Our recruitment policy is in line with SMETA 4 pillar standard and government requirements to ensure responsible recruitment is undertaken, with an awareness to the standards of the Stronger Together Initiative.

Tackling Modern Slavery – our supply chains

We assess the potential human rights risks of our supply chains by considering the country of origin where we are sourcing products or raw materials from.

Assessing and managing risk will include:

- A review of current ethical sourcing management systems, company policies and existing risk management tools.
- Research into the challenges faced by suppliers at industry and country level for fresh produce and horticulture.
- Recommendations on areas for improvement in addressing modern slavery hotspots and risks with suppliers.
- Using online resources such as Food Network of Ethical Trade (FNET) to help identify areas of highest risk and inform our prioritisation needs.

Awareness raising and capacity building

We have identified that non-permanent employees may be found throughout our supply chains due to seasonal harvesting, wild harvesting or agricultural practices used to collect botanical raw materials.

The company operated a whistleblowing policy aimed principally at our workers. Longer term our expectations will be that all of our supply chains introduce these policies to encourage their workers to report any concerns about human rights violations or any other wrong doings within their business.

All our Elderflower suppliers have been issued with and are required to comply with the ETI Base Code as a minimum requirement. <https://www.ethicaltrade.org/insights/resources/eti-base-code>

We will continue working with our Elderflower suppliers in to include commercial contractual terms requiring their compliance with the Modern Slavery Act 2015.



Our employees and suppliers can play an important role in helping us to ensure that modern slavery abuses do not take place in our business or supply chains. We will continue to deliver various training activities to raise awareness and inform our employees about the issue.

These include:

- Specific Modern Slavery Awareness training for our Senior Management Team.
- Awareness training using Stronger Together (S2G) tools for existing workers.
- Improvement in induction training to include Modern Slavery Awareness.
- We will encourage all our strategic suppliers* to use the S2G tools within their own businesses and supply chains.
- Attendance and participation in training workshops and specific customer lead initiatives for the company's Responsible Sourcing working group members.

**Strategic suppliers as identified by volume and value identified in our UEBT workplan.*

Monitoring

To assess the effectiveness of the measures taken by the company we will apply the following KPI's in relation to our current financial year and compare the results with the previous year.

- Workers trained on modern slavery.
- Percentage of strategic suppliers achieving GOLD standard in UEBT risk assessments.
- Incidents reported by whistleblower disclosures.
- Completed UEBT supplier questionnaires received.

Plans for 2025

As detailed in this statement, we have sought to adopt a thorough and robust approach to tackle modern slavery in our business and supply chains. We will continue to identify and focus on our strategic (large volume / value) raw materials.

We have undertaken B Corp Certification and achieved a minimum score of 80 against a set of social and environmental standards. Verification of B Corp certification has taken place in 2024 with certification issued in September 2024. This includes company mission statement and legal requirements to be B Corp certified.

The company will continue to enhance our policies and practices including encouraging the implementation of worker voice mechanisms throughout our supply chains. This will aid protection of worker rights and develop identification and remediation protocols.

We aim to create an internal sustainability team to monitor and maintain our supply chains.

Our Website will be launched in 2025 to communicate our B-Corp commitment.

Within Blue Sky Botanics Ltd, we will continue to strengthen our supplier relationships and for our own workers, ensure that there is a platform to raise concerns through both our policies and employee feedback.



This statement is published on the company website and a link to the statement may be found on the company intranet homepage.

This statement has been approved by the Blue Sky Board of Directors and signed on behalf of the board by:

Printed: Caroline Brevitt

Position: Managing Director

Date: 31/01/2025

Signature: 